

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

RUBY FREEMAN and
WANDREA' MOSS,

Plaintiffs,

-against-

RUDOLPH W. GIULIANI,

Defendant,

-and-

ANDREW H. GIULIANI,

Intervenor-Defendant
Applicant.

No. 24-MC-353-LJL

**NOTICE OF MOTION TO
INTERVENE UNDER FED. R.
CIV. P. 24**

To:

Aaron E. Nathan, Esq.
Marie Annie Houghton-Larsen, Esq.
Willkie Farr & Gallagher LLP
787 Seventh Avenue
New York, NY 10019
Attorneys for Plaintiffs

Michael Gottlieb, Esq.
Meryl Conant Governski, Esq.
Willkie Farr & Gallagher LLP
1875 K Street NW, Ste. 100
Washington, DC 20015
Attorneys for Plaintiffs

John Langford, Esq.
Protect Democracy
555 W. 5th St.
Los Angeles, CA 90013
Attorney for Plaintiffs

Rachel Elizabeth Goodman, Esq.
Protect Democracy
90 Broad Street, Ste. 10th Floor
New York, NY 10004
Attorney for Plaintiffs

David Labkowski, Esq.
Labkowski Law, P.A.
250 95th St., # 547233
Surfside, FL 33154
Attorney for Defendant

Kenneth A. Caruso, Esq.
Kenneth Caruso Law
15 W. 72nd Street
New York, NY 10023
Attorney for Defendant

PLEASE TAKE NOTICE THAT Intervenor-Defendant Applicant Andrew H. Giuliani, by and through his undersigned counsel, hereby moves the Court before the Honorable Lewis J. Liman, United States District Judge for the United States District Court for the Southern District of New York, Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007, at a date and time to be determined by the Court, for an Order permitting him to intervene as a defendant pursuant to Fed. R. Civ. P. 24.

PLEASE TAKE FURTHER NOTICE that, in support of this motion, Andrew Giuliani will rely upon the accompanying Memorandum of Law, Declaration of Scott B. McBride, Esq., and Declaration of Andrew H. Giuliani.

PLEASE TAKE FURTHER NOTICE that counsel for Plaintiffs and counsel for Defendant have consented to or do not otherwise oppose the granting of intervention sought by Andrew Giuliani.

PLEASE TAKE FURTHER NOTICE that a Proposed Form of Order granting intervention is submitted with this motion.

Dated: October 8, 2024
New York, New York

LOWENSTEIN SANDLER LLP

By: Scott B. McBride
Scott B. McBride
1251 Avenue of the Americas
New York, New York 10020
Telephone: (212) 262-6700
Facsimile: (212) 262-7402
smcbride@lowenstein.com

*Counsel for Intervenor-Defendant
Andrew H. Giuliani*